

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CHRISTOPHER TORRE,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 2:22-cv-04693-SDW-MAH
	:	
CHRISTINA KARDOONI, et al.,	:	
	:	
Defendants.	:	

CHRISTINA KARDOONI, of full age, hereby declares, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a named defendant in the above captioned lawsuit, which was filed by plaintiff Christopher Torre (“Plaintiff”)

2. I make this declaration based upon my own personal knowledge, in support of my motion to dismiss Plaintiff’s Complaint.

A. I am a Resident of Vancouver, Canada and Do Not Maintain Permanent Contacts with the State of New Jersey

3. I am a permanent resident of Vancouver, Canada.

4. Outside of Vancouver, Canada, I maintain a residence at my parents’ home in North Highland, California. I do not maintain a residence anywhere else in the United States.

5. I do not maintain an office in the State of New Jersey and do not maintain any records within the State of New Jersey.

6. In fact, I have not travelled to the State of New Jersey in over a year, since September 23, 2021.

7. Thus, to the extent that I possess any documents or information relating to my personal or professional life, those documents are kept in the State of California or in Vancouver, Canada.

B. My Previous Relationship with Plaintiff

8. In or about 2013 and 2014, I was in a romantic relationship with Plaintiff.

9. During my relationship with Plaintiff, neither Plaintiff nor I lived in the State of New Jersey.

10. At all times during our relationship, both Plaintiff and I maintained personal residences in the State of New York.

11. Unfortunately, my relationship with Plaintiff was not harmonious. Instead, Plaintiff repeatedly caused me to suffer significant mental and physical harm.

12. The mental and physical harm that Plaintiff inflicted upon me occurred outside of the territorial bounds of the State of New Jersey.

13. For example, on December 3, 2014, near the end of my relationship with Plaintiff, Plaintiff struck me in the face, causing me to suffer a laceration to the

inside of my lip. A true and accurate copy of a photograph reflecting those injuries, taken on December 3, 2014, is annexed hereto as Exhibit "A."

14. At the time that Plaintiff struck my face and caused me to suffer physical injuries, we were present at Plaintiff's mother's home, which is located in the State of New York.

I declare under penalty of perjury that the foregoing is true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



CHRISTINA KARDOONI

Dated: September ²⁴_____, 2022

EXHIBIT A

